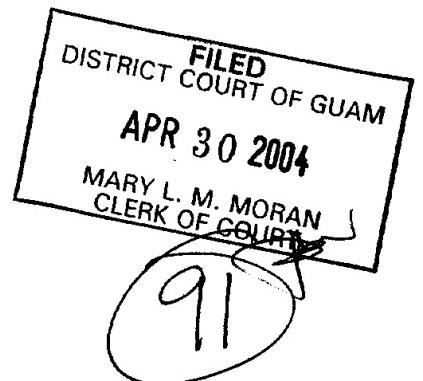


**LAW OFFICES OF BRONZE & TANG**

A Professional Corporation  
BankPacific Building, 2<sup>nd</sup> Floor  
825 South Marine Drive  
Tamuning, Guam 96913  
Telephone: (671) 646-2001  
Facsimile: (671) 647-7671

*Attorneys for Defendant*  
*Hongkong and Shanghai Banking Corporation, Ltd.*



DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU	)	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S	)	
INC., a Guam corporation,	)	
	)	
Plaintiffs,	)	<b>NOTICE OF MOTION TO STRIKE</b>
	)	<b>THE FIRST AMENDED COMPLAINT</b>
v.	)	<b>IN WHOLE OR IN PART, OR, IN THE</b>
	)	<b>ALTERNATIVE, MOTION TO</b>
HONGKONG AND SHANGHAI	)	<b>DISMISS THE THIRD AND SIXTH</b>
BANKING CORPORATION, LTD.,	)	<b>CAUSES OF ACTION AND</b>
et al.,	)	<b>SANCTIONS</b>
	)	
Defendants.	)	
	)	

**TO: PLAINTIFFS AND THEIR ATTORNEYS OF RECORD, ARRIOLA, COWAN AND ARRIOLA**

**NOTICE IS HEREBY GIVEN** that on the 28<sup>th</sup> day of May, 2004, at the hour of 3:00 p.m. or as soon thereafter as the matter can be heard at the District Court of Guam, Defendant Hongkong Shanghai Banking Corporation, Ltd. will move this Court for an Order to Strike Plaintiffs' First Amended Complaint or, in the alternative, Dismiss the Third and Sixth Causes of Action and Sanctions in this matter.

The Motion will be based upon this Notice of Motion and the Memorandum of Points and Authorities concurrently filed herein and the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the Motion.

**EXECUTED** on this 30<sup>th</sup> day of April 2004.

**LAW OFFICES OF BRONZE & TANG  
A Professional Corporation**

By: 

**JACQUES C. BRONZE**  
*Attorneys for Defendant Hongkong and  
Shanghai Banking Corporation, Ltd.*